

# The Honorable Timothy W Dore

## Chapter 7

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

COMES NOW the Chapter 7 Trustee, Ronald G. Brown, and objects to the debtor's exemptions on Schedule C as follows:

1. The debtor asserts an exemption claim under state law pursuant to RCW 6.13.010, .020, and .30 in residential real property at 2655 SW 151st Place, Burien, Washington, for “100% of fair market value up to any applicable statutory limit.” The debtor lists the debt of Hayat Sindi in the sum of \$1,548,500 as unsecured debt on Schedule F. However, the trustee’s investigation has found that Hayat Sindi recorded judgments against the real property in 2017 and 2018 that appear to fully encumber the real property and that the debtor appears to have no equity in the property by which the debtor may assert a state homestead exemption claim. In addition, the debtor does not specify a specific numerical value for the exemption claim by which to determine the extent of the exemption claim. The trustee is investigating the valuation of the residential property and is unable to determine its fair market value without further information. Therefore, for the above stated reasons, the trustee objects to the debtor’s exemption claim.

## TRUSTEE'S OBJECTIONS TO CLAIMS OF EXEMPTION - 1

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1           2. To the extent that the debtor does not describe any asset with particularity, values an  
2 asset without documentation for the valuation, and asserts a claim for which no exemption is  
3 permitted under state law or in excess of what may be allowed by law, the Trustee further objects  
4 to the assertion of an exemption in the debtor's assets.

5           3. To the extent that the actual value of an asset exceeds the valuation of the asset by the  
6 debtor, the Trustee objects to the claim of any exemption of any proceeds realized by the  
7 bankruptcy estate in excess of the amount claimed and allowable under the applicable exemption  
8 statute.

9           4. To the extent the debtor failed to disclose any assets or concealed any property, the  
10 Trustee objects to any claims of exemption by the debtor in such assets or property.

11 The Trustee reserves the right to assert any other basis for his objection or otherwise  
12 amend this objection as he may determine to be appropriate at a later date.

13 DATED this 26th day of February, 2019.

/s/ Ronald G. Brown  
Ronald G. Brown, Trustee, WSBA #8816

## TRUSTEE'S OBJECTIONS TO CLAIMS OF EXEMPTION - 2

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